

UNITED STATES BANKRUPTCY COURT
Western District Of North Carolina

MAR 25 2025

Christine F. Winchester, Clerk
Charlotte Division

IN RE: JAMIE LOUISE CLOER ESTATE

CASE NO.: 25-50041

CHAPTER 7 (Proposed Conversion to Chapter 13)

MOTION TO CONVERT CHAPTER 7 CASE TO CHAPTER 13

COMES NOW, the undersigned, appearing in the capacity of **Authorized Representative for the legal estate captioned as JAMIE LOUISE CLOER**, and pursuant to 11 U.S.C. § 706(a) and all applicable provisions of law, hereby moves this Court to convert the above-captioned Chapter 7 case to a case under Chapter 13 of Title 11 of the United States Code. In support thereof, the undersigned respectfully states the following:

1. LAWFUL RIGHT TO CONVERT

Pursuant to 11 U.S.C. § 706(a), the Authorized Representative has the right to convert this case at any time before it is closed or dismissed. The case remains open at this time, and no order of dismissal has been entered.

2. GOOD FAITH RESTRUCTURING AND INTENT TO LAWFULLY SETTLE

This motion is not filed for delay, evasion, or to frustrate creditors. It is filed in good faith with the intent to:

- Propose a lawful Chapter 13 plan based upon verified claims;
- Ensure all alleged obligations are settled pursuant to lawful tender and full disclosure;

- Allow time for the verification of standing, full accounting, and chain of title by any party asserting a claim;
- Provide honorable opportunity for settlement by constitutional means, including the use of a lawful tender instrument pursuant to applicable settlement protocols and commercial law.

3. JURISDICTIONAL CLARIFICATION

The undersigned does not appear as the debtor, but rather as the **Authorized Representative** for the legal estate captioned as JAMIE CLOER KIRBY. This motion does not constitute consent to jurisdictional presumptions, and all rights are expressly reserved under UCC 1-308.

4. PROCEDURAL INTEGRITY

All prior filings made in this case, including affidavits of income, lawful standing, and objections to claims, remain part of the record and are incorporated herein by reference.

5. CLARIFICATION OF TITLE AND STANDING

This filing includes a refined designation of title beneath the undersigned's name for the purposes of maintaining clarity on the record. While previous filings included multiple lawful designations to reflect the full private and equitable capacities held by the undersigned, this motion uses the simplified and legally recognized form:

“Authorized Representative for the legal estate captioned as JAMIE CLOER KIRBY.”

This clarification is made to ensure consistency and eliminate any future claim of confusion by opposing counsel regarding the identity or standing of the filer.

The undersigned appears in private capacity and is the same authorized party who has made all prior filings in this matter, including objections, affidavits, and settlement notices.

This clarification does **not** represent a change of status or role, but rather serves to neutralize bad-faith objections intended to delay or discredit lawful filings.

WHEREFORE, the undersigned respectfully requests that:

1. The above-captioned Chapter 7 case be converted to a proceeding under Chapter 13 of Title 11;
2. The case be preserved for plan proposal and lawful tender-based settlement;
3. All rights, exemptions, and prior filings be maintained and recognized upon conversion;
4. The Court grant such other and further relief as may be just and proper.

Expressed Date: 21, March 2025

**Respectfully Submitted in Good Faith,
All Rights Reserved Without Prejudice, UCC 1-308**

By: Cloer Jamie-Louise
Cloer: Jamie-Louise

Authorized Representative and Executor
for the Legal Estate Acting in Private
Capacity for: **JAMIE LOUISE CLOER** and
JAMIE CLOER KIRBY (Legal Entities).

**UNITED STATES BANKRUPTCY COURT
Western District of North Carolina**

In re: JAMIE LOUISE CLOER ESTATE

**Case No.: 25-50041
Chapter 13 (Converted from Chapter 7)**

COVER SHEET – CHAPTER 13 FILINGS

Submitted by:

Cloer: Jamie-Louise, Authorized Representative and Executor
Acting in Private Capacity for: JAMIE LOUISE CLOER ESTATE

Expressed Date: March 21, 2025

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